

REMARKS

Reconsideration and allowance of this subject application are respectfully requested.

Applicant notes with appreciation the Examiner's withdrawal of the anticipation rejection of claims based upon Skog et al.

All claims 1-15 stand rejected under 35 U.S.C. §103 as being unpatentable over Skog et al. in view of newly-applied Grady et al. (U.S. Patent 5,802,283). This rejection is respectfully traversed.

As the Examiner admits:

Skog et al. fails to teach an inventive concept of using the GGSN for combining the APN gateway address and the subscriber IP address, to form a unique subscriber identifier.

The Examiner relies on Grady in an attempt to teach this inventive concept missing from Skog, and in particular, on column 4, lines 39-61. This reliance is misplaced.

Grady describes a method for accessing a multimedia database contained in a multimedia server 162 by way of a Public Switch Telephone Network (PSTN) and a gateway 32. In column 1, beginning at line 64, Grady explains:

This invention implements the public switch telephone network (PSTN) to carry out transport of multimedia information from one source or multiple sources to a subscriber over a single loop in the form of copper wire or other medium, including fiber, to help remove distance as a barrier to information transfer at affordable cost.

Thus, Grady's wireline invention is directly contrary to the wireless communication issues addressed in Skog et al. Skog is directed to mapping temporary IP addresses to establish MSISDN numbers in a wireless network, which is clearly not a concern or even relevant in Grady's system.

Grady's gateway 32, as explained in column 4, beginning at line 14, controls access to the multimedia server 162 and sets up the high speed link between the server and subscriber terminals over the PSTN. Gateway 32 validates a subscriber through a log-in sequence and presents a menu of multimedia options. After receiving the subscriber's menu selection, the gateway 32 provides the multimedia server 162 with that menu selection and a network address of the subscriber. The multimedia server 162 assigns a spare port over which it will send the multimedia information and passes the port identification to the gateway. As explained at column 4, lines 50-54:

the gateway 32 passes both pieces of information via network 40 to a digital cross connect (DCC) management system 26, which controls cross connect switch (DCS) system 24 to set up a temporary connection between the relevant input and output ports.

Thus, the two pieces of information—the port identification and the customer identification—are simply pieces of separate information that are transported together in one message. These two different information elements are used independently from each other. Grady fails to disclose forming a third, unique identifier based upon the two identifiers.

Contrary to the Examiner's assertion, there is no teaching in Grady of combining the port of identification with customer identification to form a third, unique subscriber identifier that may be used as an accounting identifier. Indeed, Applicant finds no teaching or even a reference to accounting identifiers.

Thus, even if Skog and Grady could be combined, (for purposes of argument only), their combination still fails to disclose all of the features recited in the independent claims. Skog's MSISDN and IP address are and remain separate identifiers. They are never combined and used to formulate a new identifier to uniquely identify the mobile subscriber. The same is true in Grady. The port identification and the customer identification remain separate pieces of information. They are never put together and used as a new identifier for a mobile subscriber. Nor does either reference generate a unique subscriber identifier without using any new system resources other than those already available.

The application is condition for allowance. An early notice to that effect is earnestly solicited.

Leif Einar AUNE
Appl. No. 09/803,022
March 17, 2004

Respectfully submitted,

NIXON & VANDERHYE P.C.

By:

A handwritten signature in black ink, appearing to read "John R. Lastova", is written over a horizontal line.

John R. Lastova
Reg. No. 33,149

JRL:at
1100 North Glebe Road, 8th Floor
Arlington, VA 22201-4714
Telephone: (703) 816-4000
Facsimile: (703) 816-4100